

FILED

MAY 24 2023

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:22-CR-00721 SRC SRW
)	
ALEXANDRIA COLLINS,)	
)	
Defendant.)	

MOTION FOR CONTINUED DETENTION

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tracy Lynn Berry, Assistant United States Attorney for said District, and requests that the previous request for detention against the defendant continue.

As and for its grounds, the Government states as follows:

1. A previous indictment, cause number 4:22-CR-00721 SRC SRW was filed against defendant on December 21, 2022. Defendant is charged with a violation of Title 18, United States Code, Section 1001(a)(3), to wit, making and using a false statement to an agency of the judicial branch of the federal government.

2. Pursuant to Title 18, United States Code, Section 3142(g), defendant's detention pending trial is warranted by: the weight of the evidence; her history and characteristics, including being on supervised release at the time of the offense; and the nature and seriousness of the economic danger to any person or the community that would be posed by Defendant's release.

3. The defendant is an economic threat to the community.

4. There is a serious risk that the defendant will obstruct or attempt to obstruct justice, or threaten, injure or intimidate, or attempt to threaten, injure or intimidate a prospective witness or juror because, while on supervised release, Defendant made a false statement to law enforcement in order to impede in the criminal investigation of United States v. Ricky Johnson, No. 4:22CR00468 HEA/SPM.

5. There is a continued serious risk that the defendant will flee if released on bond. WHEREFORE, the Government requests that the previous request of detention continue against defendant.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ Tracy Lynn Berry
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